

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JENNIFER ECKHART,

Plaintiff,

v.

FOX NEWS NETWORK, LLC and ED HENRY, in  
his individual and professional capacities,

Defendants.  
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Case No. 1:20-cv-05593 (RA)

**DECLARATION OF  
MICHAEL J. WILLEMIN**

I, **Michael J. Willemin**, pursuant to 28 U.S.C. §1746, declare and state as follows:

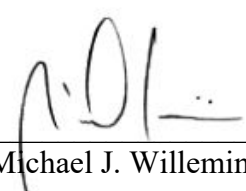
1. I am a Partner at the law firm Wigdor LLP, counsel for Plaintiff Jennifer Eckhart. I have personal knowledge of the facts set forth herein and submit this declaration in opposition of Defendant Ed Henry's ("Henry") motion to strike, motion for sanctions and motion for a more definite statement.

2. Attached hereto as **Ex. A** is a true and accurate copy of the email correspondences with Catherine Foti, Esq., counsel for Defendant Henry, dated November 15, 2020, regarding our proposal to provide Henry with the names of the Jane Doe witnesses on the condition that Henry agreed to not contact them prior to the start of discovery. The proposal was ultimately declined by Ms. Foti.

3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: January 6, 2021  
New York, New York

By: \_\_\_\_\_

  
Michael J. Willemin